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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	Criminal No. 21- 219
v.)	(18 U.S.C. § 922(g)(1))
DOUGLAS WRIGHT)	[UNDER SEAL]

INDICTMENT

COUNT ONE

CLERK U.S. DISTRICT COURT

WEST. DIST. OF PENNSYLVANIA

The grand jury charges:

From on or about November 16, 2020, and continuing thereafter until on or about December 28, 2020, in the Western District of Pennsylvania, the defendant, DOUGLAS WRIGHT, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit:

- 1. Manufacture, Delivery, or Possession with Intent to Manufacture or Deliver a Controlled Substance, on or about December 2, 2009, at Case Number CP-02-CR-0003597-2009, in the Court of Common Pleas, County of Allegheny, Commonwealth of Pennsylvania;
- 2. Possession of Firearm Prohibited, on or about September 9, 2010, at Case Number CP-02-CR-0003241-2010, in the Court of Common Pleas, County of Allegheny, Commonwealth of Pennsylvania;
- 3. Possession of Firearm Prohibited, on or about January 7, 2019, at Case Number CP-02-CR-0009241-2016, in the Court of Common Pleas, County of Allegheny, Commonwealth of Pennsylvania;
- 4. Firearms Not to be Carried without License, on or about January 7, 2019, at Case Number CP-02-CR-0009241-2016, in the Court of Common Pleas, County of Allegheny, Commonwealth of Pennsylvania; and

- 5. Manufacture, Delivery, or Possession with Intent to Manufacture or Deliver a Controlled Substance, on or about January 7, 2019, at Case Number CP-02-CR-0009241-2016, in the Court of Common Pleas, County of Allegheny, Commonwealth of Pennsylvania, did knowingly possess in and affecting interstate commerce, a firearm and ammunition, namely,
 - 1. a Taurus, model G3C, 9mm caliber pistol, bearing serial number ABK 061358;
 - 2. a Springfield Armory, model XDS-45 ACP, .45 ACP caliber pistol, bearing serial number BY320612;
 - 3. a Phoenix Arms, model HP22A, .22 caliber pistol, bearing serial number 4255879;
 - 4. Federal 9mm caliber ammunition; and
 - 5. Remington .22 caliber long rifle hollow point ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

The Grand Jury re-alleges and incorporates by reference the allegation contained in Count One of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 924(d); and Title 28, United States Code, Section 2461(c). As a result of the knowing commission of the violation of Title 18, United States Code, Section 922(g)(1), as charged in Count One of the Indictment, the firearms and ammunition involved in that Count, which were involved in the commission of the offense, are subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1). The property to be forfeited includes:

- 1. a Taurus, model G3C, 9mm caliber pistol, bearing serial number ABK 061358;
- 2. a Phoenix Arms, model HP22A, .22 caliber pistol, bearing serial number 4255879;
- 3. Federal 9mm caliber ammunition;
- 4. Remington .22 caliber long rifle hollow point ammunition;
- 5. Three (3) 9mm pistol magazines; and
- 6. One (1) Springfield .45 ACP pistol magazine.

A True Bill,

Foreperson

STEPHEN R. KAUFMAN

Acting United States Attorney

PA ID No. 42108